

# EXHIBIT 1

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**From:** Bender, Kristin <KBender@willkie.com>  
**Sent:** Thursday, April 3, 2025 7:46 PM  
**To:** Pohlman, Daniel J.; Breed, Maxwell; Dougherty, Megan  
**Cc:** Stephanie Roeser  
**Subject:** RE: Subpoenas

Hi Dan, Max, Megan,

We have further considered the subpoenas issued by Ms. Lively to Ms. Case and Ms. Koslow in connection with our teleconference on March 25. We recall that you framed the conversation in terms of “why us” and “why now” as well as raised a question as to what information, at bottom, these subpoenas are intended to obtain. We did not discuss specific requests in detail, although one or more of the requests for phone records (RFPs 11-13) was identified by you as a request that could be viewed as reasonable.

I have listed below several proposed modifications to address your concerns regarding the timing of party discovery and in an attempt to further lessen any burden on Ms. Case and Ms. Koslow. Please note that with these proposed adjustments, we reserve the right to seek any documents and communications with the Wayfarer Parties (as contemplated in the initial requests) at a later point in time if not otherwise available from the parties themselves.

- RFP 1: add limitation of “Documents and Communications with Baldoni, Heath, Sarowitz, or Abel need not be produced.”
- RFPs 2, 4: revise from “with or concerning” to “concerning”
- RFPs 5-7: add limitation of “with Sony, WME, Jonesworks, TAG, Wallace, Street Relations, any media or Social Media outlet, any cast or crew members of the Film, and any directors, officers, employees, agents, or contractors thereof.”

Please let us know if these adjustments resolve your concerns or whether you have additional concerns. We are happy to discuss the proposed modifications and any other issue as useful.

Best,  
Kristin

**Kristin Bender**  
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**From:** Pohlman, Daniel J. <dpohlman@pryorcashman.com>  
**Sent:** Monday, March 17, 2025 3:48 PM  
**To:** Bender, Kristin <KBender@willkie.com>; Breed, Maxwell <MBreed@pryorcashman.com>  
**Cc:** Roeser, Stephanie <SRoeser@manatt.com>; Dougherty, Megan <MDougherty@pryorcashman.com>  
**Subject:** RE: Subpoenas

\*\*\* EXTERNAL EMAIL \*\*\*

Kristin,

Please find attached responses and objections to the subpoenas directed to non-parties Katherine Case and Breanna Butler Koslow

Best,  
Dan

—  
Daniel J. Pohlman / PRYOR CASHMAN LLP / 212.326.0823

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**From:** Bender, Kristin <[KBender@willkie.com](mailto:KBender@willkie.com)>  
**Sent:** Monday, March 3, 2025 1:12 PM  
**To:** Breed, Maxwell <[MBreed@pryorcashman.com](mailto:MBreed@pryorcashman.com)>; Pohlman, Daniel J. <[dpohlman@pryorcashman.com](mailto:dpohlman@pryorcashman.com)>  
**Cc:** Roeser, Stephanie <[SRoeser@manatt.com](mailto:SRoeser@manatt.com)>  
**Subject:** RE: Subpoenas

Great, thank you Max, and likewise.

**Kristin Bender**  
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**From:** Breed, Maxwell <[MBreed@pryorcashman.com](mailto:MBreed@pryorcashman.com)>  
**Sent:** Monday, March 3, 2025 12:56 PM  
**To:** Bender, Kristin <[KBender@willkie.com](mailto:KBender@willkie.com)>; Pohlman, Daniel J. <[dpohlman@pryorcashman.com](mailto:dpohlman@pryorcashman.com)>  
**Cc:** Roeser, Stephanie <[SRoeser@manatt.com](mailto:SRoeser@manatt.com)>  
**Subject:** RE: Subpoenas

\*\*\* EXTERNAL EMAIL \*\*\*

Kristin:

Exactly the email we were expecting today—we're happy to accept service of both subpoenas and we look forward to working with you on this matter.

Best,

Max

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**MAXWELL BREED**

Partner

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**From:** Bender, Kristin <[KBender@willkie.com](mailto:KBender@willkie.com)>  
**Sent:** Monday, March 3, 2025 12:35 PM  
**To:** Breed, Maxwell <[MBreed@pryorcashman.com](mailto:MBreed@pryorcashman.com)>; Pohlman, Daniel J. <[dpohlman@pryorcashman.com](mailto:dpohlman@pryorcashman.com)>  
**Cc:** Roeser, Stephanie <[SRoeser@manatt.com](mailto:SRoeser@manatt.com)>  
**Subject:** Subpoenas

Hi Maxwell and Daniel,

We understand from your notices of appearance on Friday, February 28, 2025, that you represent non-parties Katherine Case and Breanna Butler Koslow with respect to Lively v. Wayfarer Studios, 24-cv-10049.

Please advise whether you accept service of the attached subpoenas on behalf of Ms. Case and Ms. Koslow.

Best,  
Kristin

**Kristin Bender**  
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